



June 14, 2024

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080**

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks of June 3 and June 10:

1. Yesterday, the State AG Track conferred with Defendants regarding the use of Plaintiff Fact Sheets or Master Discovery Requests in that track. The State AG Track today proposed to Defendants a schedule for bringing this dispute before Judge Singh.
2. Defendants today provided the Self-Funded Payer Track with a proposed Plaintiff Fact Sheet.
3. Plaintiffs in the Direct Purchaser and TPP PBM actions submitted a proposal to consolidate these actions, eliminate the current TPP Class Track, and create a new DPP Class Track [ECF No. 195]. Defendants filed a response [ECF No. 210]. Plaintiffs sent a proposed schedule to Defendants to govern an amended consolidated complaint and motions to dismiss, and Defendants have sent a counterproposal.
4. Defendants provided the Self-Funded Payer Track with their Motions to Dismiss the Albany, Lake, and King County Complaints.
5. The parties filed, and the Court entered, a stipulated ESI Protocol conforming with Judge Singh's May 28, 2024 Order.

We thank the Court for its continuing attention to this matter.

Hon. Brian R. Martinotti, U.S.D.J.

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Respectfully submitted,

/s/ James E. Cecchi

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Third-Party Payer Class Track

/s/ David R. Buchanan

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/s/ Joanne Cicala

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State Attorney General Track

/s/ John D. Tortorella

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cc: Honorable Rukhsanah L. Singh, U.S.M.J. (via ECF)
Counsel of Record (via ECF)